



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Criminal Case No. <u>08cr0400-IEG</u>
)	
Plaintiff,)	<u>I N F O R M A T I O N</u>
)	
v.)	
)	
JASON ALAN O'NEAL,)	Title 18, U.S.C., Sec. 1001(a)(2)-
aka Jason Alan Brown,)	False Statements
)	
Defendant.)	

The United States Attorney charges:

1. At all times pertinent up through January 9, 2008:

a. Defendant JASON ALAN O'NEAL, aka Jason Alan Brown, was employed as an officer with the Bureau of Customs and Border Protection, Department of Homeland Security, an agency within the Executive Branch of the United States Government and was most recently assigned to the Secure Electronic Network for Travelers Rapid Inspection (SENTRI) program at the Otay Mesa, California Port of Entry.

b. The Treasury Enforcement Communications System (TECS) is a computer system managed by the Department of Homeland Security and is a repository for data from many separate agency sources which assists law enforcement officers in the performance of their official duties.

c. Officers of the Bureau of Customs and Border Protection are issued a secure password authorizing them to access the TECS

1 database as necessary but are not authorized to utilize TECS for
2 personal reasons or for any purpose other than the performance of
3 their official duties.

4 2. On or about January 8, 2008, within the Southern District
5 of California, in a matter within the jurisdiction of the
6 Executive Branch of the United States Government, to wit, a
7 "smuggling" investigation being conducted by the Federal Bureau of
8 Investigation, defendant JASON ALAN O'NEAL, aka Jason Alan Brown, did
9 knowingly and willfully make false, fictitious, and fraudulent
10 statements and representations as to material facts to Special Agents
11 Terry C. Reed, Jr. and Sara G. Guzman, that is, he used TECS (with
12 only a few exceptions) solely in his official capacity as an officer
13 with the Bureau of Customs and Border Protection, whereas in truth and
14 fact, as defendant then and there well knew, defendant accessed the
15 TECS database in an unofficial and personal capacity to monitor SENTRI
16 and border crossings of his girlfriend (who was suspected of illegal
17 activities) over 100 times making the statements and representations
18 false, fictitious, and fraudulent when made.
19 In violation of Title 18, United States Code, Section 1001(a)(2).

20 DATED: February 19, 2008.

21 KAREN P. HEWITT
22 United States Attorney

23 By: Edward C. Weiner
24 EDWARD C. WEINER
25 Assistant U.S. Attorney
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